

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Qwest Communications International, Inc.)
) WC Docket No. 02-189
Consolidated Application for Authority to Provide)
In-Region, InterLATA Services in Montana, Utah)
Washington, and Wyoming)
_____)

**DECLARATION OF GEOFFREY NIELSON
ON BEHALF OF WORLD.COM, INC.**

Based on my personal knowledge and on information learned in the course of my duties, I, Geoffrey Nielson, declare as follows:

1. My name is Geoffrey Nielson. I have been working in the DSL wholesale business for 2 years. Prior to joining WorldCom, Inc., I was the provisioning Process Manager for Rhythms NetConnections, Inc. I have been working at WorldCom Inc., since WorldCom Inc. purchased Rhythms NetConnections, Inc., in December 2001. I am Senior Staff Specialist III in the DSL Operations group and have responsibility for all DSL service delivery processes and systems. I have 3 years experience with process and system integrations with high-tech companies internationally and in the Western United States.

2. WorldCom provides DSL service to businesses and ISPs in Washington and leases both xDSL-capable loops and the high frequency portion of local loops from Qwest. WorldCom's DSL business requires WorldCom to interface with Qwest and

access Qwest's systems and databases in order to pre-qualify, order, and maintain the loops required to provide DSL service. Without access to Qwest's pre-ordering systems, for example, we would not be able to tell whether a particular loop is qualified for DSL. WorldCom relies on Qwest to provide status-updates on our orders by returning timely and accurate order completion notices or rejects followed by provisioning completion notifications.

Qwest Does Not Provide All Pertinent Loop Qualification and Loop Make-up Information

3. WorldCom is not gaining access to all the relevant loop makeup information that is available in Qwest's network. When WorldCom queries Qwest's loop qualification database using Qwest's IMA/EDI loop make-up tool, we do not always receive all pertinent information. For example, WorldCom may perform a query and find that fiber exists in the loop, in which case we are unable to provide DSL service to that customer. Yet, we are not told that a redundant copper facility over which we could provide that customer DSL service is available. Although Qwest suggests that it has populated its database to include spare copper facilities, it has not been WorldCom's experience that this type of information is actually available. WorldCom thus has had to unnecessarily reject customers' orders for DSL service simply because we have not been provided all relevant loop qualification information.

Qwest Improperly Issues a SOC Before Completing the DSL Order

4. WorldCom has experienced problems with the accuracy of Qwest's Service Order Completions (SOC) for its line sharing orders. For example, WorldCom received a SOC for certain line sharing orders, but then a customer complaint revealed that Qwest had not yet completed the order. Discussions with the Qwest central office technician handling

the orders revealed that SOC's may be transmitted electronically to a CLEC regardless of whether work actually has been completed. A SOC should not be transmitted until the work actually has been completed in the central office. Prematurely issuing SOC's creates customer-impacting issues for WorldCom because WorldCom has been lead to believe – and informed its customers accordingly -- that service will be turned up on a certain date. Customers are dissatisfied with WorldCom when they do not receive service on the day promised.

5. On July 8, 2002, WorldCom sent a written request to Qwest for more information about some orders for which we received SOC's prior to the work actual being completed by Qwest. Qwest responded over 20 days later stating that it had sent WorldCom jeopardies for these orders. Based on my research, I do not believe WorldCom ever received such jeopardies from Qwest. Even if we had received them, I am concerned that Qwest is autocompleting orders before completing the actual work. This calls into question the veracity of Qwest's provisioning performance data.

6. This concludes my declaration on behalf of WorldCom.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 1, 2002

_____/s/_____/

Geoffrey Nielson

EXHIBIT 1

From: Tom Priday [Tom.Priday@wcom.com]
Sent: Tuesday, July 30, 2002 11:56 AM
To: Lori Wright (E-mail)
Cc: Kimberly.Scardino@wcom.com; geoff.nielson@wcom.com;
stenerelli@rhythms.net; 'Sherry Lichtenberg (E-mail)'; Chad Warner (E-mail)
Subject: FW: Qwest Service Order Completions

Here is the long-awaited response from Qwest

Tom

----- Original Message -----

From: Lillian Robertson [mailto:lmrobelgqwest.com] Sent: Tuesday, July 30, 2002 8:59 AM
To: Tom.Priday@wcom.com
Cc: Sue Gwin
Subject: Re: Qwest Service Order Completions

Tom,
Here is the response regarding the situation on the service order WorldCom identified. Should you have any questions, I may be reached on 303 965-0432. Thank you.
Lillian Robertson

1. WorldCom submitted PON # AC12002401057 for line sharing on 4/24/02. SOC was received on 4/29/02 but the work required to provision the customer's DSL service was not completed. Please provide us with a root cause analysis of this problem.

2. What is the triggering event for a DSL line sharing service order completion? Specifically, is the completion notification generated based on notification from the CO technician that the work has been completed in the central office or is it triggered based on the completion interval for the order type?

ANSWER: 1&2

World Com Telephone Number 

This order was placed in jeopardy status twice on April 29, 2002 as a result of a TIE pair problem in the central office. A spare TIE pair was assigned and the order was worked. The supervisor interviewed the Qwest technician, who stated that the circuit had been wired all the way through, and completed in the Qwest system. At the time this order was completed, the orders were not archived in our systems. As of July 3, 2002, this system's orders that are not frame complete before the Service Order Processors (SOPS) auto-complete are tracked to ensure completion of the service.

3. What is the triggering event for the service order completion on a UNE-P Voice migration order?

ANSWER: 3

These orders auto complete on the due date. Service Order Processors (SOPS) do auto complete at a set time during the day. This can be reference in InfoBuddy under SOPAD completions.

Please **respond** to Tom.Priday@wcom.com

To: "Sue Gwin (E-mail)" <sgwin@qwest.com>, "Lillian **Robertson** (E-mail)"
<lmrobel@qwest.com>
cc:
Subject: Qwest Service Order Completions

Sue & Lillian,

WorldCom has been experiencing problems with the accuracy of Qwest Service order Completions (SOCs) for our DSL line sharing orders. Although

WorldCom

has received completions for orders via its EDI interface, subsequent customer complaints have determined that Qwest did not complete the work required at the main distribution frame to actually turn up the circuits in question.

Discussion with the CO technician handling the orders revealed that SOC's may be transmitted electronically to a CLEC regardless of whether work was completed. Our specific questions appear below:

1. WorldCom submitted PON # AC12002401057 for line sharing on 4/24/02. SOC was received on 4/29/02 but the work required to provision the customer's DSL service was not completed. Please provide us with a root cause analysis of this problem.
2. What is the triggering event for a DSL line sharing service order completion? Specifically, is the completion notification generated based on notification from the CO technician that the work has been completed in the central office or is it triggered based on the completion interval for the order type?
3. What is the triggering event for the service order completion on a UNE-P voice migration order?

Since these are customer impacting issues, we request a written answer by July 12, 2002.

Any questions, please call

Tom Priday
WorldCom Carrier Management (Qwest Territory) VNET 625-4356
303-217-4356
PAGER: 888-268-7371